

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONALD J. TRUMP, DONALD J. TRUMP
JR., ERIC TRUMP, IVANKA TRUMP,

and

THE DONALD J. TRUMP REVOCABLE
TRUST, THE TRUMP ORGANIZATION,
INC., TRUMP ORGANIZATION LLC, DJT
HOLDINGS LLC, DJT HOLDINGS
MANAGING MEMBER LLC, TRUMP
ACQUISITION LLC, and TRUMP
ACQUISITION, CORP.,

Plaintiffs,

- against -

DEUTSCHE BANK AG,

Defendant,

and

COMMITTEE ON FINANCIAL SERVICES
OF THE U.S. HOUSE OF
REPRESENTATIVES and PERMANENT
SELECT COMMITTEE ON
INTELLIGENCE OF THE U.S. HOUSE OF
REPRESENTATIVES,

Intervenor-Defendants.

Docket No. 1:19-cv-03826-ER

JOINT STATUS REPORT

Pursuant to this Court's order of February 24, 2022, the parties submit this status report concerning future proceedings in this case:

STATEMENT OF PARTIES

Plaintiffs and Intervenor-Defendants are continuing to engage in negotiations intended to narrow or resolve their disputes. In the last 30 days, the parties (including Deutsche Bank AG, as the custodian of records) continued to work through considerations related to the scope, logistics, and

other factors implicated by the proposal, including further review and comments on a proposed written settlement agreement that has been circulated among the parties. The parties also continued discussions regarding a reasonable period of time needed, following the conclusion of a resolution to this matter, to allow for any further necessary review of materials, consultation among the parties, and other efforts to facilitate the production of responsive information based on the final parameters of any ultimate settlement. All parties agree that an additional 30 days will aid those negotiations and will further allow coordination with Deutsche Bank regarding the implementation and other considerations of any agreed-upon process. To allow additional time for these discussions, the parties respectfully request that the Court set a new date for a status report of April 25, 2022.

Dated: March 25, 2022

s/ Douglas N. Letter

Douglas N. Letter
Todd B. Tatelman
Eric. R. Columbus
Stacie Fahsel
OFFICE OF GENERAL COUNSEL
U.S. HOUSE OF REPRESENTATIVES
5140 O'Neill House Office Bldg.
Washington, D.C. 20515
(202) 225-9700
douglas.letter@mail.house.gov

*Counsel for the Committee on Financial Services and
Permanent Select Committee on Intelligence of the U.S.
House of Representatives*

s/ Steven R. Ross

Steven R. Ross
Raphael A. Prober
Parvin D. Moyne
Thomas C. Moyer
AKIN GUMP STRAUSS HAUSER & FELD LLP
2001 K Street N.W.
Washington, D.C. 20006
(202) 887-4343

Counsel for Deutsche Bank AG

Respectfully submitted,

s/ Patrick Strawbridge

Patrick Strawbridge
CONSOVOY MCCARTHY PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
patrick@consovoymccarthy.com

William S. Consovoy
Cameron T. Norris
CONSOVOY MCCARTHY PLLC
3033 Wilson Blvd., Ste. 700
Arlington, VA 22201
(703) 243-9423
will@consovoymccarthy.com
cam@consovoymccarthy.com

*Counsel for President Donald J. Trump, Donald J. Trump
Jr., Eric Trump, Ivanka Trump, The Donald J. Trump
Revocable Trust, The Trump Organization, Inc., Trump
Organization LLC, DJT Holdings LLC, DJT Holdings
Managing Member LLC, Trump Acquisition LLC, and
Trump Acquisition, Corp.*